

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNILOC 2017 LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 19-1075 (CFC)
	)	
ZENPAYROLL, INC., d/b/a/ GUSTO,	)	
	)	
Defendant.	)	

**DEFENDANT ZENPAYROLL, INC.'S MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendant ZenPayroll, Inc., d/b/a Gusto (“Defendant”), moves to dismiss Plaintiff Uniloc 2017 LLC’s Amended Complaint (D.I. 14) for failure to state a claim upon which relief can be granted. The grounds for this motion are set forth in Defendant’s Opening Brief, submitted herewith.

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*/s/ Jack B. Blumenfeld*

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September 3, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on September 3, 2019, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused to be served copies of the foregoing document on September 3, 2019, upon the following in the manner indicated:

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